

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
JOHN AND DONNA MARINO : CHAPTER 13
Debtors. :

US BANK NA as Legal Title Trustee for :
Truman 2016 SC6 Title Trust :
Movant, :

vs. :
JOHN AND DONNA MARINO : CASE NO. 5-20-03437
Respondents. :

DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362

AND NOW COMES, John and Donna Marino, the Debtors, and files an Answer to US Bank's
Motion for Relief From the Automatic Stay:

1. John and Donna Marino (hereinafter the "Debtors") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtor has failed to make post-petition mortgage payments.
3. Debtors Counsel is in the process of contacting the Debtor to ascertain if the payments have been made and/or if Debtors are in possession of the funds to cure the alleged default.
4. In the event there remains an arrears, the Debtor wishes to enter into a Stipulation to cure the arrears over a six (6) month period and/or include the arrears in an amended Chapter 13 Plan.
5. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: February 3, 2022

/s/Tullio DeLuca

Tullio DeLuca, Esquire

PA ID# 59887

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 3, 2022, he caused a true and correct copy of
Debtor's Answer to US Bank's Motion for Relief from the Automatic Stay to be served Via First Class
United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Jack N. Zaharopoulos, Esq. at info@pamd13trustee.com

Emmanuel J. Argentieri, Esq. at eargentieri@rgalegal.com

Dated: February 3, 2022

/s/Tullio DeLuca
Tullio DeLuca, Esquire